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VIA ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

7/2/2020

Re: Sidanov v. Magellan Healthcare, Inc. et al., 19-cv-05375-PAE

Dear Judge Engelmayer:

As this Court is already aware, the undersigned represent Plaintiff Galina Sidanov ("Sidanov") in the above-referenced matter.

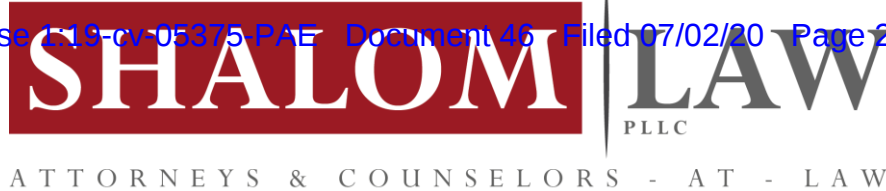
We write to respectfully request: (i) to withdraw as Sidanov's counsel in this matter; and (ii) for a brief stay of the proceedings to permit Sidanov an opportunity to retain substitute counsel.

With respect to the instant matter, irreconcilable differences and additional professional considerations concerning this litigation require us to seek the Court's permission to move to withdraw as counsel.

Pursuant to the Model Rules of Professional Conduct, a lawyer may withdraw from the representation of a client if, *inter alia*, (i) withdrawal can be accomplished without material adverse effect on the interests of the client, or (ii) the client insists on taking action with which the lawyer has a fundamental disagreement. *See* Model Rules of Prof'l Conduct R. 1.16(b).

Moreover, Civil Local Rule 1.4 states:

An attorney who has appeared as attorney of record for a party may be relieved or displaced only by order of the court and may not withdraw from a case without leave of the Court granted by order. Such an order may be granted only upon a showing by affidavit or other satisfactory reasons for withdrawal or displacement and the posture of the case, including its position, if any, on the calendar, and whether or not the attorney is asserting a retaining or charging lien. All applications to withdraw must be served upon the client and (unless excused by the Court) upon all other parties.



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Here, our firms and Sidanov have reached irreconcilable differences despite our repeated attempts to communicate and resolve our disagreement with Sidanov, it is now evident the attorney-client relationship has been harmed beyond repair, and we informed Sidanov of our need to seek leave to withdraw.

Because many of the details of our proposed motion are subject to the attorney-client privilege, it would be inappropriate to describe at length the substance of our disagreement with Sidanov at this time.

Further, insofar as discovery is still ongoing and extended as a result of the COVID-19 pandemic and that this case is far from trial, Sidanov's interests will not be adversely affected by withdrawal if afforded an opportunity to seek alternate counsel. Accordingly, we also wish to seek a sixty-day stay of proceedings in our contemplated motion so that Sidanov can retain new counsel and avoid suffering any prejudice.

We appreciate the Court's attention to this matter.

SHALOM LAW, PLLC

/s/ Jonathan Shalom

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